

VANDERBILT UNIVERSITY



NASHVILLE, TENNESSEE 37203

TELEPHONE (615) 322-7311

Department of Telecommunications • 2015 Terrace Place • Fax Number (615) 343-5555 • Direct phone 322-0000

February 10, 2000

RECEIVED

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Commissioner Gloria Tristani
Federal Communications Commission
Room 8-C302
445 Twelfth Street, S. W.
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the
Commercial Mobile Radio Services

Dear Commissioner Tristani:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Vanderbilt University has closely followed the Calling Party Pays (CPP) rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit education institution deeply concerned that without appropriate safeguards, CPP will expose Vanderbilt University to significant financial liability that would undermine our ongoing effort to provide educational services.

Vanderbilt University currently has over 10,000 students, and 16,000 full and part-time employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

Currently, students and employees place telephone calls from extensions on campus buildings that are routed through a centralized PBX controlled by the telecommunications department. Our existing PBXs can easily be programmed to block, or track call detail for a variety of calls, such as toll (1+) calls and calls to pay-per-call services (i.e. calls to 900 numbers), based on the unique numbering schemes associated with these types of calls. For example, when a student places a long distance call from his/her dormitory room, the PBX recognizes the 1+ dialing pattern and knows to request an authorization code before completing the call. This process enables our telecommunications department to bill the individual call for his/her toll charges. If a new type of toll call is introduced (in the form of a CPP service) that does not use the same type of numbering scheme as toll calls under the North American Numbering Plan, our PBX will be unable to identify the call and request the authorization code we need to bill the toll to the cost-causing party.

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We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentation in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes (SACs) to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest-- and accommodate the needs of education institutions such as ours-- by assigning a unique SAC to all CPP numbers.

We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,

Glen Miller
Director of Telecommunications
Vanderbilt University

Cc: Adam Krinsky

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Commissioner Harold W. Furchtgott-Roth
Federal Communications Commission
Room 8-A302
445 Twelfth Street, S. W.
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the
Commercial Mobile Radio Services

Dear Commissioner Furchtgott-Roth:

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Commissioner Michael K. Powell
Federal Communications Commission
Room 8-A204
445 Twelfth Street, S. W.
Washington, DC 20554

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Cc: Peter A. Tenhula

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Mr. Thomas Sugrue
Chief, Wireless Telecommunications Bureau
Federal Communications Commission
Room 3-C254
445 Twelfth Street, S. W.
Washington, DC 20554

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Mr. James D. Schlichting
Deputy Bureau Chief
Wireless Telecommunications Bureau
Federal Communications Commission
Room 3-C254
445 Twelfth Street, S. W.
Washington, DC 20554

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We understand that the record before the Commission reflects a range of views on how large institutions might control the level of unauthorized CPP calls. We have considered the many options available and have consistently supported the numbering solution advocated by ACUTA in its written comments and oral presentation in this proceeding. The most efficient, cost-effective, and administratively simple way to deal with the problem of unauthorized CPP calls is by assigning one or more identifiable Service Access Codes (SACs) to CPP numbers. With very little effort, and at almost no cost, our PBXs could be programmed to recognize the numbering patterns of other chargeable calls. The SAC solution would also save our institution the considerable expense and disruption of replacing the PBXs we have in use with costly, next-generation equipment that could distinguish CPP calls without identifiable numbering.

As a non-profit educational institution, we are always concerned when we face the prospect of uncertain or uncontrollable external costs. On our campus, wireless telephones have become increasingly popular, particularly with students. Thus, our concern about the likelihood of unrecoverable costs associated with CPP calls is well placed. Given the re-allocation of financial responsibility caused by CPP, the importance of enabling subscribers to block, or track, CPP calls is undeniable. The Commission would best serve the public interest—and accommodate the needs of education institutions such as ours—by assigning a unique SAC to all CPP numbers.

We appreciate the opportunity to offer the Commission our views on this matter, and we look forward to the successful implementation of CPP in a manner that will take into account the needs of all affected parties.

Sincerely,



Glen Miller
Director of Telecommunications
Vanderbilt University

VANDERBILT UNIVERSITY

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February 10, 2000

Commissioner Susan Ness
Federal Communications Commission
Room 8-B115
445 Twelfth Street, S. W.
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the
Commercial Mobile Radio Services

Dear Commissioner Ness:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Vanderbilt University has closely followed the Calling Party Pays (CPP) rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit education institution deeply concerned that without appropriate safeguards, CPP will expose Vanderbilt University to significant financial liability that would undermine our ongoing effort to provide educational services.

Vanderbilt University currently has over 10,000 students, and 16,000 full and part-time employees. With an extensive telecommunications infrastructure accessible to such a large number of student and employee users, we face the very real threat of uncontrollable, unauthorized CPP calls.

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Commissioner Ness

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Sincerely,



Glen Miller
Director of Telecommunications
Vanderbilt University

Cc: Mr. Mark Schneider

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February 10, 2000

Commissioner Susan Ness
Federal Communications Commission
Room 8-B115
445 Twelfth Street, S. W.
Washington, DC 20554

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Commercial Mobile Radio Services

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Glen Miller
Director of Telecommunications
Vanderbilt University

✓Cc: Mr. Mark Schneider

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February 10, 2000

Chairman William E. Kennard
Federal Communications Commission
Room 8-B201
445 Twelfth Street, S. W.
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the
Commercial Mobile Radio Services

Dear Chairman Kennard:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Vanderbilt University has closely followed the Calling Party Pays (CPP) rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit education institution deeply concerned that without appropriate safeguards, CPP will expose Vanderbilt University to significant financial liability that would undermine our ongoing effort to provide educational services.

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Glen Miller
Director of Telecommunications
Vanderbilt University

Cc: Mr. Ari Fitzgerald

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February 10, 2000

Chairman William E. Kennard
Federal Communications Commission
Room 8-B201
445 Twelfth Street, S. W.
Washington, DC 20554

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Director of Telecommunications
Vanderbilt University

Cc: Mr. Ari Fitzgerald

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February 10, 2000

Mr. Joe Levin
Wireless Telecommunications Bureau
Federal Communications Commission
Room 3-B135
445 Twelfth Street, S. W.
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the
Commercial Mobile Radio Services

Dear Mr. Levin:

As a member of ACUTA: the Association of Telecommunications Professionals in Higher Education, Vanderbilt University has closely followed the Calling Party Pays (CPP) rulemaking proceeding and strongly supports the positions expressed in ACUTA's comments. Like many ACUTA members, we are a non-profit education institution deeply concerned that without appropriate safeguards, CPP will expose Vanderbilt University to significant financial liability that would undermine our ongoing effort to provide educational services.

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Mr. Levin

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February 10, 2000

Mr. David Siehl
Wireless Telecommunications Bureau
Federal Communications Commission
Room 3-A164
445 Twelfth Street, S. W.
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the
Commercial Mobile Radio Services

Dear Mr. Siehl:

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February 10, 2000

Ms. Kris Monteith
Wireless Telecommunications Bureau
Federal Communications Commission
Room 3-C122
445 Twelfth Street, S. W.
Washington, DC 20554

Re: WT Docket No. 97-207: Calling Party Pays Service Offering in the
Commercial Mobile Radio Services

Dear Ms. Monteith:

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